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Application GRANTED. The settlement conference scheduled for January 13, 2020 is ADJOURNED to January 23, 2020, at 2:15 p.m.,

in Courtroom 20A. All other provisions of the Order Scheduling Settlement Conference (Dkt. No. 30) remain in effect, including the January 7, 2020

requirement that the parties conduct at least one good-faith settlement discussion prior to the conference, convey at least one good-faith offer and demand, and submit their confidential settlement letters to

chambers no later than January 17, 2020. SO ORDERED.

Barbara Moses, U.S.M.J. January 7, 2020

VIA ECF AND ELECTRONIC MAIL

Honorable Barbara C. Moses **United States District Court** Southern District of New York 500 Pearl Street New York, NY 10007

Viviana Espinosa v. Weill Cornell Medical College,

Case No. 1:18-cv-11665 (AT)

Dear Judge Moses:

This law firm represents Defendant Weill Cornell Medical College ("Defendant") in the above-referenced matter. Defendant submits this letter jointly with Plaintiff Viviana Espinosa ("Plaintiff," and, together with Defendant, the "Parties") to respectfully request a brief extension of the settlement conference currently scheduled for January 13, 2020. This is the Parties' first request to adjourn the conference and all Parties consent to this request.

On October 30, 2019, Your Honor scheduled a settlement conference for January 13, 2020. (Dkt. # 30). In the intervening time, the Parties have diligently continued to pursue discovery in this matter. At the Parties request, District Judge Torres recently extended the Parties' deposition discovery deadline to January 14, 2020. (Dkt. # 36). Based on this new deadline, the Parties anticipate conducting the final deposition in this matter on January 14, 2020. Accordingly, the Parties respectfully request that the settlement conference be adjourned to January 23, 2020 to allow the Parties time to complete discovery in advance of settlement efforts. The Parties are all available on January 23rd and, based on a telephone call with Chambers, understand that the Court also has availability that day. On behalf of the Parties, we thank the Court for its time and consideration in this matter.

/s/ Benjamin E. Stockman Benjamin E. Stockman, Esq. **VENABLE LLP**

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Sincerely,

/s/ Elizabeth Budnitz Elizabeth Budnitz, Esq. GODDARD LAW PLLC 39 Broadway, Suite 1540 New York, NY 10006 Tel: (646) 504-8363 liz@goddardlawnyc.com Attorney for Plaintiff